



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

ATLANTA FEDERAL CENTER

61 FORSYTH STREET

ATLANTA, GEORGIA 30303-8960

FEB 20 2015

CERTIFIED MAIL 7010 1060 0002 1703 9751

RETURN RECEIPT REQUESTED

Mr. James Bennett
Town Manager
Town of Red Springs
P.O. Box 790
Red Springs, North Carolina 28377

Re: Information Request pursuant to 308 of the Clean Water Act
National Pollutant Discharge Elimination System Permit No.: NC0025577
Town of Red Springs WWTP

Dear Mr. Bennett:

The U.S. Environmental Protection Agency Region 4 is continuing to investigate the Town of Red Springs' (Town) compliance with Sections 301, 307(d) and 402 of the Clean Water Act (CWA), 33 U.S.C. §§ 1311, 1317(d) and 1342; the regulations promulgated thereunder at 40 C.F.R. Parts 122 and 403; and the National Pollutant Discharge Elimination System (NPDES) Permit No.: NC0025577. Pursuant to Section 308 of the CWA, 33 U.S.C. § 1318, the EPA hereby requests that the Town provide the information set forth in Enclosure A. The Town is required to respond to this information request within seven business days of its receipt of this letter.

The response should be directed to:

Ms. Alenda Johnson
U.S. Environmental Protection Agency, Region 4
NPDES Permitting and Enforcement Branch
Atlanta Federal Center
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

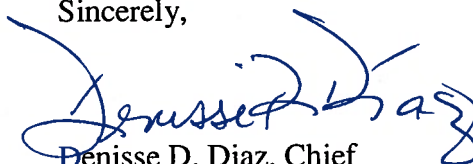
The Town's response should specifically reference the particular section and item number of the request and should be organized for the purpose of clarity. In addition, all information submitted must be accompanied by the following certification signed by a responsible Town official in accordance with 40 C.F.R. § 122.22:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, I certify that the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Failure to comply with this information request may result in enforcement proceedings under Section 309 of the CWA, 33 U.S.C. § 1319, which could result in the judicial imposition of civil or criminal penalties or the administrative imposition of civil penalties. In addition, there is potential criminal liability for the falsification of any response to the requested information.

If you have questions regarding this notice and information request, please contact Ms. Alenda Johnson at (404) 562-9761 or via e-mail at Johnson.Alenda@epa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Denisse D. Diaz", is written over the typed name.

Denisse D. Diaz, Chief
NPDES Permitting and Enforcement Branch
Water Protection Division

Enclosures

cc: Mr. Jay Zimmerman, Acting Division Director
North Carolina Department of Environment and Natural Resources

ENCLOSURE A

INFORMATION REQUEST PURSUANT TO SECTION 308 OF THE CLEAN WATER ACT

Instructions

1. Identify the person(s) responding to this Information Request.
2. Please provide a separate narrative response to each and every Question and subpart of a Question set forth in this Information Request.
3. Precede each answer with the text and the number of the Question and its subpart to which the answer corresponds.
4. All documents submitted must contain a notation indicating the Question and subpart of the Question to which they are responsive.
5. In answering each Information Request Question and subpart thereto, identify all documents and persons consulted, examined or referred to in the preparation of each response, and provide true and accurate copies of all such documents.
6. If information not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, you must supplement your response to the EPA. Should you find at any time after the submission of your response that any portion of the submitted information is false or misrepresents the truth, you must notify the EPA as soon as possible.
7. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question to which it responds.
8. Where specific information has not been memorialized in a document, but is nonetheless responsive to a Question, you must respond to the Question with a written response.
9. If information responsive to this Information Request is not in your possession, custody or control, then identify the person from whom such information may be obtained.
10. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Question or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.
11. The EPA requests that all documents provided in an electronic format be compatible with pdf.
12. The EPA requests that all spreadsheet information be in an electronic format and compatible with MS Excel.
13. If any Question relates to activities undertaken by entities other than the recipient of this Information Request, and to the extent that you have information pertaining to such activities, provide such information for each entity.

Definitions

1. All terms not defined herein shall have their ordinary meanings, unless such terms are defined in the Clean Water Act or its implementing regulations, in which case the statutory or regulatory definitions shall control.
 2. Words in the masculine may be construed in the feminine if appropriate, and vice versa, and words in the singular may be construed in the plural if appropriate, and vice versa, in the context of a particular question or questions.
 3. The terms "And" and "Or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed outside its scope.
 4. The term "Identify" means, with respect to a natural person, to set forth the person's name, present or last known business address and business telephone number, present or last known home address and home telephone number, and present or last known job title, position or business.
 5. The term "Identify" means, with respect to a document, to provide its customary business description; its date; its number, if any (invoice or purchase order number); the identity of the author, addressee and/or recipient; and substance of the subject matter.
 6. The term "Identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including a sole proprietorship), to set forth its full name, address, legal form (e.g., corporation, partnership, etc.), organization, if any, and a brief description of its business.
 7. The term "publicly owned treatment works" or "POTW" means the POTW and its associated devices and systems used in the storage, treatment, recycling and reclamation of municipal sewage or industrial wastes, as defined in 40 C.F.R. § 403.3(q), owned and/or operated by Town of Red Springs located in Red Springs, North Carolina.
 8. The term "wastewater treatment plant" or "WWTP" means the portion of the POTW owned and/or operated by Town of Red Springs located at Red Springs Wastewater Treatment Plant, NC Highway 71, in Red Springs, Robeson County, North Carolina.
 9. The term "You" and "Your" shall mean Town of Red Springs, North Carolina.
 10. The term "Permit" shall mean National Pollution Discharge Elimination System (NPDES) Permit No. NC0025577 issued to the Facility by the State of North Carolina.
 11. "Approval Authority" shall mean the North Carolina Department of Environment and Natural Resources pursuant to 40 C.F.R. § 403.3(c).
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Questions

1. Please provide a legible copy of the Table of Organization for the Town of Red Springs. Include the name of each organizational unit, a description of each organizational unit's mission, the number of crews and positions (indicate whether position is filled or vacant) that are assigned to each organizational unit. Also include the names of the responsible person for each organizational unit and his/her staff members.
2. Provide a schematic of the WWTP in the POTW system and explain its unit treatment processes and normal operating parameters for each unit. Identify the POTW's overall design flow, and its average daily flow for each of the last five years.
3. Provide a timeline of any interference and/or pass-through event(s), as these terms are defined in 40 C.F.R. § 403.3, which the POTW system assets have experienced due to non-domestic discharges from January 1, 2010 to Present (last five years). For each such event, also provide:
 - a. The date/time the event began and ended and the assets of the POTW system affected;
 - b. A discussion of the extent of the problems created for the POTW system, and/or the POTW's receiving waters;
 - c. A discussion of the investigation undertaken by the POTW to isolate the source(s), and any evidence which was collected and report(s) identifying the non-domestic source(s);
 - d. The POTW's NPDES permit narrative or numerical conditions violated due to the event;
 - e. A discussion/evidence of the actions the POTW has independently taken under its local authority to enforce or address the problems caused by the non-domestic discharge(s), and
 - f. Copies of any written notices given to the Approval Authority concerning the event or the investigative findings.
4. The WWTP has experienced mercury effluent violations over the past five years. Describe how mercury detected in the influent wastewater is typically handled at the treatment plant and provide details of your facility standard operating procedures for handling such interferences.
5. Provide all wastewater monitoring data collected by the Facility, or under contract to, the Facility starting January 1, 2010 to Present, for samples taken at dental facilities located within and connected to the Town of Red Springs POTW, including the influent and effluent sampling data. Include laboratory chain of custody sheets and the following information for each sample taken:
 - a. Parameter monitored;
 - b. Date monitored;
 - c. Analytical result;
 - d. Unit(s) of measurement;
 - e. Analytical method;

- f. Sample type (grab, time-proportional composite, or flow proportional composite)
 - g. Flow recorded at the time of monitoring;
 - h. Sampling location; and
 - i. Flow monitoring location.
6. Provide legible copies of all Influent and Effluent Facility daily operators' logs (narrative and data) for the periods and associated with the sampling specified in items 3 and 5.
 7. Provide any documents (consultant studies, designs, recommendations, etc.) prepared in the last five (5) years to address mercury effluent limit violations. Include specific time lines on implementation and final compliance with requirements of the NPDES permit. Please provide any projected capital and operations and maintenance (O&M) costs necessary to meet the requirements of the NPDES permit.
 8. Provide a copy of the POTW's local Sewer Use Ordinance(s) which identify the discharge limitations and requirements for non-domestic users, and include the effective date(s).
 9. Provide summaries of the POTW's pollutant scans of the influent, effluent, and biosolids for January 1, 2010 to Present. The influent and effluent summaries should identify (for each sampling): the date sampled, the type of sample (grab/flow-proportional/time-proportional), the pollutant monitored, the analytical results and units, a description of the collection location, and the analytical cost to the POTW. For biosolids, the summary should identify: the date sampled, the pollutant monitored, the analytical results and units, the mass disposed and date, the disposal location, and the aggregate transportation and disposal cost to the POTW per unit mass. The EPA prefers that these summaries be provided in an electronic spreadsheet format compatible with MS Excel.
 10. Provide summaries of any isolated monitoring of Dr. Jackson, Dr. Locklear and other non-domestic-users associated with mercury sampling conducted from January 1, 2010 to Present. The summaries should identify (for each sampling): the non-domestic user being monitored, the date sampled, the type of sample (grab/flow-proportional/time-proportional), the pollutant monitored, the analytical results and units, a description of the collection location, the analytical cost to the POTW, and whether the sampling was routine or non-routine and why. The EPA prefers that this summary be provided in an electronic spreadsheet format compatible with MS Excel.
 11. If the POTW has surveyed its non-domestic users, identified pollutants of concern, identified the maximum allowable headworks loadings, identified maximum allowable industrial loadings or background loadings, pursuant to the EPA's Local Limits Development Guidance (7/2004), then please provide this information with a date and detailed explanation of the most recent analyses.

12. Provide a list of all known non-domestic users, identifying:
- a. The WWTP to which they discharge and if they contribute there by a sewer connection or by land transport hauls;
 - b. Their street addresses;
 - c. Brief descriptions of their individual business operations;
 - d. Their estimated/actual average daily process flows; and
 - e. Whether each such user has a permit to discharge to the POTW. If so, then for each such permit provide the permit number(s), effective date(s), duration(s), and identify the applied federal standards (e.g., 403, 433.17, etc).

The EPA prefers that this list be provided in an electronic spreadsheet format compatible with MS Excel.

13. Provide a summary of sewer lateral replacement(s) at the dental office locations, identifying:
- a. Name of lateral owner;
 - b. Date of replacement;
 - c. Location of replacement;
 - d. Type of pipe replaced;
 - e. Pipe size;
 - f. Cost associated with replacement (i.e. man hours, equipment use, and actual pipe cost).
14. Provide legible copies of Discharge Monitoring Reports (DMRs) organized chronologically for the period January 1, 2012 through Present. The DMR copies must be paired with all supporting documentation which was relied on to prepare and report the information including, but not limited to: laboratory reports, bench sheets, chain-of-custody records, related spreadsheet records, and calibration records for equipment used for in-situ analyses (e.g., TRC, flow, DO, and pH). Also include the daily influent and effluent operator logs for this period.

